

Clean Air Act 112(r) Newsletter

Accident Release Prevention Requirements / Risk Management Programs

U.S. Environmental Protection Agency, Region 10

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This newsletter provides information on the Risk Management Program and other issues relating to the Accidental Release Prevention Requirements of the Clean Air Act. The information should be used as a reference tool, not as a definitive source of compliance information. Compliance regulations for CAA section 112(r) are published in 40 CFR Part 68.

RMP*WebRC Scope Expanded

The Environmental Protection Agency (EPA) recently expanded the number of elements that can be edited in the Risk Management Plan (RMP) via the web tool RMP*WebRC. Using the web-based tool, RMP filers can now view and edit much of the data in the Registration section (first section) of their most recent RMP related to: *parent company; latitude/longitude; phone and mailing information for owner/operator; name and identification of person responsible for RMP implementation; emergency contact; Local Emergency Planning Committee; number of employees on site; OSHA, EPCRA and CAA Title V; and RMP preparer.*

RMP*WebRC makes RMP corrections easy and more efficient. RMP filers still have the option to either use the internet or to resubmit a new RMP diskette at any time to make any corrections. Making a correction to the RMP does not change the five-year anniversary date for updating the entire RMP.

It is outside the scope of RMP*WebRC to change the following:

- Elements in the first section of the RMP related to: name or address of the facility, facility identification number, or the name of owner or

operator; alter the program level or chemical list and quantities; or alter the Executive Summary.

- Sections 2-9 of the RMP, which deal with worst-case and alternate chemical accident scenarios, accident history, and prevention response plan.

For these changes, the facility must send in a diskette containing the entire RMP, or a paper copy of the RMP if a computer is unavailable.

With RMP*WebRC, the facility amends the latest RMP. RMP*WebRC uses EPA's Central Data Exchange (CDX) for submitting data. Many facilities have already used it for other EPA programs. In order to first access RMP*WebRC, a representative of the facility must first register using the unique facility web password provided by EPA's Reporting Center. For registration assistance, call the CDX Help Desk at 888-890-1995. New passwords can be obtained by the RMP Reporting Center at 301-429-6019.

Steps To Use RMP*WebRC

1. Identify an individual who will make all data entries in RMP*WebRC for your facility.

2. Go to <http://cdx.epa.gov/RMP/Invitation/>. In the opening screen, enter only the first three of the following unique customer information elements for your facility *exactly* (The Barcode will be used later if you wish to address more than one facility; see instruction 4, below):

Your facility's unique information:

Random Code: «RMP_KEY»
 Facility ID: «FACILITY»
 Owner/Operator Name of Record: «OWNER»
 Barcode: «BARCODE»

3. You will then be prompted to go to the CDX registration screens for your one-time registration, where you will provide required information.
4. You may then enter RMP*WebRC, where you can add to your registration other facilities for which your company may have received invitations/passwords (e.g., if your company has more than one RMP facility). You will be prompted to select a facility to proceed to the next step.
5. Six pages of data from the Registration section of the RMP will be displayed. You can enter or change information to the active data fields.
6. Make your desired corrections and follow the prompts to exit the system. You will receive an email providing a confirmation number in the email box you registered.
7. To log in to CDX RMP*WebRC in the future, use your name and password at the web address provided in your "Welcome to EPA CDX" email that you received after you initially register with CDX.

Is Your Emergency Contact Current?

In your RMP, you are required to identify an Emergency Contact and provide that person's name, title, phone number, e-mail address (if any), and a 24-hour phone/pager number. Keeping this information up-to-date is important as it will help emergency responders and others in your community.

If you change emergency contact personnel or related information, you are required to correct the corresponding information in your RMP within **one month** of making the change. Updating your RMP to reflect administrative changes, such as a change in the name or phone number of the Emergency Contact, can be made using RMP*WebRC.

Methyl Ethyl Ketone (MEK) no Longer Considered a Toxic Air Pollutant

On December 13, 2005, EPA issued a final rule removing methyl ethyl ketone (MEK) from the list of toxic air pollutants. Although MEK was not a RMP pollutant, it was subject to EPCRA 313 annual reporting and CERCLA release reporting.

After extensive technical review and consideration of public comments, EPA has concluded that potential exposures to MEK emitted from certain industrial processes may not reasonably be anticipated to cause human health or environmental problems.

- ☐ Methyl ethyl ketone (MEK) is cited under EPCRA Section 313 Toxic Chemicals with CAS/Category Code 78-93-3.
- ☐ Ketone compounds manufacturing is classified under NAICS Code 325199.

MEK is used as a solvent in the surface coatings industry, specifically in manufacturing vinyl lacquers, some lacquers and acrylics. Industries also use MEK for producing adhesives, magnetic tapes, printing inks, degreasing and cleaning fluids, as a dewaxing agent for lubricating oils and as an intermediate in the production of antioxidants and perfumes.

EPA reviewed MEK exposure and health effects in response to a petition from the American Chemistry Council and completed an analysis to determine if there were grounds to grant the petition.

EPA's final rule removes MEK from a list of 188 air toxics for which EPA is required to develop national, technology-based emissions control standards. However, emissions of MEK will continue to be regulated as a volatile organic compound because of its contribution to the formation of ground-level ozone (smog). Facilities emitting MEK in areas not meeting national ambient air quality standards for ozone remain subject to volatile organic compound emissions limits through other Clean Air Act programs.

N New Video On Sodium Hydrosulfide Hazards

The U.S. Chemical Safety and Hazard Investigation Board (CSB) has posted on its website a new video illustrating the work of the agency on the hazards of sodium hydrosulfide (NaHS).

The video can be viewed online in the Video Archive section of www.csb.gov.

The video provides a compelling way for people in industry, emergency responders, and the public to learn more about specific hazards and how to prevent chemical accidents in the future.

"Preventing Harm from Sodium Hydrosulfide" is a seven-minute Video Safety Bulletin describing good management practices to prevent deaths and injuries involving the chemical. Sodium hydrosulfide (NaHS) - a process chemical used in the paper, mining, and leather industries. Although NaHS is not a RMP chemical, it releases highly toxic **hydrogen sulfide gas** when mixed with acid or heated. The video highlights information

found in the CSB's written safety bulletin on NaHS first issued in July 2004. The bulletin found that NaHS accidents have caused at least 32 deaths, 176 injuries, 351 medical evaluations, and 10 evacuations of plants and communities since 1971.

The video, which outlines the dangers of mishandling NaHS, summarizes the health hazards associated with hydrogen sulfide gas, and recommends safe management and emergency response practices.

The CSB is an independent federal agency charged with investigating industrial chemical accidents. CSB investigations look into all aspects of chemical accidents, including physical causes such as equipment failure as well as inadequacies in safety management systems. The Board provides safety recommendations to plants, industry organizations, labor groups, and regulatory agencies such as OSHA and EPA.

What Questions Do Citizens Want Answered?

Experts say that when citizens learn about hazardous chemicals used near them, they most want answers to questions such as:

- What are the health effects of hazardous substances at the site?
- Are community injuries or deaths likely from this site?
- How does the facility affect the environment?
- Is the facility addressing its potential risks?
- Are there alternative chemicals that can be used in lieu of the hazardous ones?
- Are community planners and responders aware of the facility's emergency response plans?
- How can I independently verify chemical risk information?
- Is the facility reducing, eliminating, and preventing possible risks?